

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BCS SOFTWARE, LLC,

Plaintiff

v.

ZOHO CORPORATION

Defendant

Case No. 6:21-cv-51

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff BCS Software, LLC (“Plaintiff” or “BCS”) hereby asserts the following claims for patent infringement against Zoho Corporation (“Defendant” or “Zoho”), and alleges, upon information and belief, as follows:

THE PARTIES

1. BCS Software, LLC is a limited liability company organized and existing under the laws of the Texas with its principal place of business at 600 Columbus Avenue, Suite 106, #7, Waco, Texas 76701.
2. Upon information and belief, Zoho Corporation is a multinational technology company organized and existing under the laws of the State of Florida, with a regular and established place of business located at 6800 Burleson Rd, Building 310, Suite 2000, Austin, Texas 78744 and may be served through its designated agent for service of process, Registered Agents Inc., 7901 4th St. N Suite 300, St. Petersburg, Florida 33702.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).
4. Defendant has committed acts of infringement in this judicial district.
5. Upon information and belief, Defendant has a regular and established place of business at 6800 Burleson Rd, Building 310, Suite 2000, Austin, Texas 78744.
6. Upon information and belief, the Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in the state of Texas, has conducted business in the state of Texas, and/or has engaged in continuous and systematic activities in the state of Texas.
7. Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in the Western District of Texas.
8. Venue is proper in the Western District of Texas pursuant to 28 U.S.C. § 1400(b).

U.S. PATENT NO. 8,819,120

9. BCS is the owner, by assignment, of U.S. Patent No. 8,819,120 ("the '120 Patent"), entitled "METHOD AND SYSTEM FOR GROUP COMMUNICATIONS," which issued on August 26, 2014.
10. The '120 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.
11. The '120 Patent includes numerous claims defining distinct inventions.

12. The priority date of each of the '120 Patents is at least as early as October 2004. As of the priority date, the inventions as claimed were novel, non-obvious, unconventional, and non-routine.
13. The claims of the '120 Patent are not drawn to laws of nature, natural phenomena, or abstract ideas. Although the systems and methods claimed in the '120 Patent are ubiquitous now (and, as a result, are widely infringed), the specific combinations of elements, as recited in the claims, were not conventional or routine at the time of the invention.
14. Further, the claims of the '120 Patent contain inventive concepts which transform the underlying non-abstract aspects of the claims into patent-eligible subject matter.
15. Consequently, the claims of the '120 Patent recite apparatuses and methods resulting in improved functionality of the claimed systems and represent technological improvements to the operation of computers. The claims of the '120 Patent unconventionally provide a group communication system allowing a group of users to participate in communications including internal mail, message exchanging and accessing files. *See, e.g.*, '120 Patent at Abstract.
16. The claims of the '120 Patent overcome deficiencies existing in the art as of the date of invention and comprise non-conventional approaches that transform the inventions as claimed into substantially more than mere abstract ideas. For example, as of the date of invention, “[w]hat a modern enterprise desires is a true collaborative environment in which co-workers or individuals involved can share information and data, and participate in discussion confidentially without intrusions from others, regardless where they are and in what time zone.” '120 Patent at 2:20-25. The inventions as claimed overcome these

deficiencies in the state of the art and provide substantial technological benefits to all parties. Further, as of the date of invention, “Email and IM each provide some features desired for a true collaborative environment but none offers all. The present invention discloses a collaborative platform that facilitates such requirements. Besides providing a non-intrusive communication platform, the present invention also provides data mobility to users.” *Id.* at 2:25-30. As such, the inventions as claimed provide non-conventional solutions to the conventional problems of the day because the collaborative platform allowed users to enjoy more secure interactions, along with data mobility.

NOTICE OF BCS’ PATENTS

17. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,240,421 (the “’421 Patent”), entitled “System, software and apparatus for organizing, storing and retrieving information from a computer database,” which issued on May 29, 2001. A copy of the ’421 Patent is available at <https://patents.google.com/patent/US6240421B1/en?oq=6240421>.
18. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,421,821 (the “’821 Patent”), entitled “Flow chart-based programming method and system for object-oriented languages,” which issued on July 16, 2002. A copy of the ’821 Patent is available at <https://patents.google.com/patent/US6421821B1/en?oq=6421821>.
19. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,658,377 (the “’377 Patent”), entitled “Method and system for text analysis based on the tagging, processing, and/or reformatting of the input text,” which issued on December 2, 2003. A copy of the ’377 Patent is available at <https://patents.google.com/patent/US6658377B1/en?oq=6658377>.
20. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,895,502 (the “’502 Patent”), entitled “Method and system for securely displaying and confirming request to perform

operation on host computer,” which issued on May 17, 2005. A copy of the ’502 Patent is available at <https://patents.google.com/patent/US6895502B1/en?oq=6895502>.

21. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,200,760 (the “’760 Patent”), entitled “System for persistently encrypting critical software data to control the operation of an executable software program,” which issued on April 3, 2007. A copy of the ’760 Patent is available at <https://patents.google.com/patent/US7200760B2/en?oq=7200760>.
22. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,302,612 (the “’612 Patent”), entitled “High level operational support system,” which issued on November 27, 2007. A copy of the ’809 Patent is available at <https://patents.google.com/patent/US7302612B2/en?oq=7302612>.
23. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,533,301 (the “’301 Patent”), entitled “High level operational support system,” which issued on May 12, 2009. A copy of the ’809 Patent is available at <https://patents.google.com/patent/US7533301B2/en?oq=7533301>.
24. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,730,129 (the “’129 Patent”), entitled “Collaborative communication platforms,” which issued on June 1, 2010. A copy of the ’129 Patent is available at <https://patents.google.com/patent/US7730129B2/en?oq=7730129>.
25. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,840,893 (the “’893 Patent”), entitled “Display and manipulation of web page-based search results,” which issued on November 23, 2010. A copy of the ’893 Patent is available at <https://patents.google.com/patent/US7840893B2/en?oq=7840893>.

26. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,895,282 (the “’282 Patent”), entitled “Internal electronic mail system and method for the same,” which issued on February 22, 2011. A copy of the ’282 Patent is available at <https://patents.google.com/patent/US7895282B1/en?oq=7895282>.
27. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,890,809 (the “’809 Patent”), entitled “High level operational support system,” which issued on February 15, 2011. A copy of the ’809 Patent is available at <https://patents.google.com/patent/US7890809B2/en?oq=7890809>.
28. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,996,464 (the “’464 Patent”), entitled “Method and system for providing a user directory,” which issued on August 9, 2011. A copy of the ’464 Patent is available at <https://patents.google.com/patent/US7996464B1/en?oq=7996464>.
29. Plaintiff is the owner, by assignment, of U.S. Patent No. 7,996,469 (the “’469 Patent”), entitled “Method and system for sharing files over networks,” which issued on August 9, 2011. A copy of the ’469 Patent is available at <https://patents.google.com/patent/US7996469B1/en?oq=7996469>.
30. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,171,081 (the “’081 Patent”), entitled “Internal electronic mail within a collaborative communication system,” which issued on May 1, 2012. A copy of the ’081 Patent is available at <https://patents.google.com/patent/US8171081B1/en?oq=8171081>.
31. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,176,123 (the “’123 Patent”), entitled “Collaborative communication platforms,” which issued on May 8,

2012. A copy of the '123 Patent is available at

<https://patents.google.com/patent/US8176123B1/en?oq=8176123>.

32. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,285,788 (the "'788 Patent"), entitled "Techniques for sharing files within a collaborative communication system," which issued on October 9, 2012. A copy of the '788 Patent is available at <https://patents.google.com/patent/US8285788B1/en?oq=8285788>.
33. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,554,838 (the "'838 Patent"), entitled "Collaborative communication platforms," which issued on October 8, 2013. A copy of the '838 Patent is available at <https://patents.google.com/patent/US8554838B1/en?oq=8554838>.
34. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,819,120 (the "'120 Patent"), entitled "Method and system for group communications," which issued on August 26, 2014. A copy of the '120 Patent is available at <https://patents.google.com/patent/US8819120B1/en?oq=8819120>.
35. Plaintiff is the owner, by assignment, of U.S. Patent No. 8,984,063 (the "'063 Patent"), entitled "Techniques for providing a user directory for communication within a communication system," which issued on March 17, 2015. A copy of the '063 Patent is available at <https://patents.google.com/patent/US8984063B1/en?oq=8984063>.
36. Plaintiff is the owner, by assignment, of U.S. Patent No. 9,396,456 (the "'456 Patent"), entitled "Method and system for forming groups in collaborative communication system," which issued on July 19, 2016. A copy of the '456 Patent is available at <https://patents.google.com/patent/US9396456B1/en?oq=9396456>.

DEFENDANT'S PRODUCTS

37. Upon information and belief, Defendant makes, uses, imports, sells, and/or offers for sale the Zoho Docs and Zoho WorkDrive product (the “Accused Product”).
38. Defendant performs and induces others to perform a method for sharing data via a server.

COUNT I
(Infringement of U.S. Patent No. 8,819,120)

39. Plaintiff incorporates each of the foregoing paragraphs by reference.
40. Defendant has been on notice of the '120 Patent at least as early as the date it received service of this complaint.
41. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least claims 1, 2 and 3 of the '120 Patent by making, using, importing, selling, and/or, offering for sale the Accused Product.
42. Defendant, with knowledge of the '120 Patent, infringes the '120 Patent by inducing others to infringe the '120 Patent. In particular, Defendant intends to induce its customers to infringe the '120 Patent by encouraging its customers to use the Accused Product. Defendant's acts of inducement are actionable at least as of the date of service of the Original Complaint in this matter.
43. Defendant also induces others, including its customers, to infringe the '120 Patent by providing technical support for the use of the Accused Product.
44. Upon information and belief, at all times Defendant owns and controls the operation of the Accused Product in accordance with an end user license agreement.
45. Claim 1 of the '120 Patent recites:
 1. A method for sharing data via a server, comprising:
 - (a) receiving by the server a request from a first client machine to establish a

- connection with a second client machine;
- (b) forwarding the request by the server to the second client machine;
 - (c) permitting the first client machine to communicate with the second client machine via the server in response to the second client machine granting the request;
 - (d) in response to the first client machine uploading a file to a file list coupled to a store that is remotely located to the first and second client machines:
 - (i) notifying the second client machine by the server of the file, and
 - (ii) establishing a level of access to the file list coupled to the store, wherein the store is independent of a file path and unnavigable to by a user; and
 - (e) establishing a connection between the file list and the store by a secured channel to download the file.

With the Accused Product, Defendant performs a method for sharing data via a server. For example, Defendant provides Zoho Docs and Zoho WorkDrive (“server”) which let users share data including but not limited to documents and images within a team.

ZOHO Writer Sheet Show Mail Projects Sign All Products English

Docs File Management for Individuals WorkDrive New File Management for Teams & Businesses

Docs Features Products Pricing Download Resources

Get started with clutter-free storage.

Zoho WorkDrive (for teams) Zoho Docs (for individuals)

Check out our new content collaboration platform—Zoho WorkDrive, specially designed for teams to work better together.

START MY FREE TRIAL

Source: <https://www.zoho.com/docs/>

Cloud Storage

Store all your files, images, and music in a central location and share them effortlessly with friends and colleagues. [Learn more](#)

Bulk uploads
Upload files individually, or select and save multiple files at once.

Store large files
Save videos, product screenshots, and even entire databases without worrying about file size.

Email in
Send documents from your email or scanner directly to your cloud account without signing in.

Organize
Create folders and subfolders to categorize your files by projects, file types, function, etc., and find anything instantly.

Source: <https://www.zoho.com/docs/features.html>

Share and Collaborate

Set permissions, share files, and brainstorm with your colleagues to enhance productivity.
[Learn more](#)

**Password protected links**

Control access to confidential information by setting up a password for your documents.

**Group sharing**

Forget sharing files with your team members one at a time. Create a group alias and share ideas as often as you like.

**In-app chat**

Group collaboration used to mean endless back-and-forth messages and lots of wasted time. Now discuss ideas and decide changes in real time with the chat feature within the document.

**Tasks and reminders**

Manage and delegate work among team members. Set reminders and notifications to get work done on time.



Source: <https://www.zoho.com/docs/features.html>

Help Home > Docs - FAQ > General

What is Zoho Docs?

Zoho Docs is an Online Document Management system where you can store all your files securely in a centralized location and can access them from anywhere and from any device. You can upload, store, create, edit, share, and view any type of file like documents, spreadsheets, presentations, pictures, music, videos, etc. Our advanced collaboration tools such as Shared Folders, Tasks and Groups will provide a collaborative environment for you and your team. You can also collaborate on documents in real-time, which is useful when you work as a team. To know more about our features, please check out our [Overview page](#).

+ What can I do with Zoho Docs?

Source: <https://www.zoho.com/docs/faq/zoho-docs-faq.html>

General

What is Zoho WorkDrive?

Zoho WorkDrive is a secure online file storage and collaboration platform for modern teams, small businesses, and large enterprises.

What is a Super Admin?

What is a Team Admin?

What are team members?

Source: <https://www.zoho.com/workdrive/faqs.html>

46. With the Accused Product, Defendant performs a method for sharing data via a server comprising receiving by the server a request from a first client machine to establish a connection with a second client machine. For example, Zoho Docs and Zoho WorkDrive (“server”) receives a file sharing request from a first user in order to share files with a second user. Zoho Docs and Zoho WorkDrive generate a share link which is shared with the second user to provide access to the shared files.

Share and Collaborate

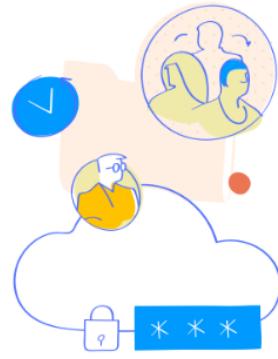
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Source: <https://www.zoho.com/docs/features.html>

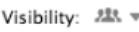
Zoho Docs allows you to share files with individuals or a group and collaborate in real-time. You can either share individual files or organize all your files into folders and share it with your team or with external partners, clients and customers. Shared folders are ideal for people who work on the same files together. When you create a new shared folder and add people to it, the files in the shared folder will appear in their Zoho Docs just as they do in yours. Any user who is part of the shared folder can add, delete or edit the content within that folder, based on the access privileges.

Share Files with Collaborators

With Zoho Docs, files and folders can be shared easily with any individuals within or outside the organization by just entering their email IDs.

To share files with collaborators

Share Settings X

Visibility: 

Collaborators:

<input type="text" value="aaron.jones <aaron.jones@zillium.com>,"/>	<div style="border: 1px solid #ccc; padding: 2px; display: inline-block;"> Read/Write ▼ </div> <div style="margin-top: 5px;"> <input checked="" type="checkbox"/> Read Only <input checked="" type="checkbox"/> Read/Write <input type="checkbox"/> Co-Owner </div>
<input type="button" value="Share"/> <input type="button" value="Cancel"/>	
 raymond.p@zylker.com Read/Write X	

Source: <https://www.zoho.com/docs/help/secure-sharing.html>

Zoho Docs users can share multiple documents at once with an unlimited number of people. You can share either privately, which requires entering email addresses manually, or with a preformed group. You can also assign either read-only or read-and-edit permissions to the recipients.

To Share Documents to Individuals

1. Select the document you want to share.
2. Right-click on the file select Share.
3. A dialog box with heading *Share settings* appears on the screen.
4. Enter the email address of the recipient.
5. Specify the access permission (Viewer/Collaborator/Co-Owner) for the shared document.
6. Click Share

To Share Documents to Groups

1. Select the document you want to share.
2. Right-click on the file select Share.
3. A dialog box with heading *Share settings* appears on the screen.
4. Enter the name of the recipient group.
5. Specify the access permission (Viewer/Collaborator/Co-Owner) for the shared document.
6. Click Share

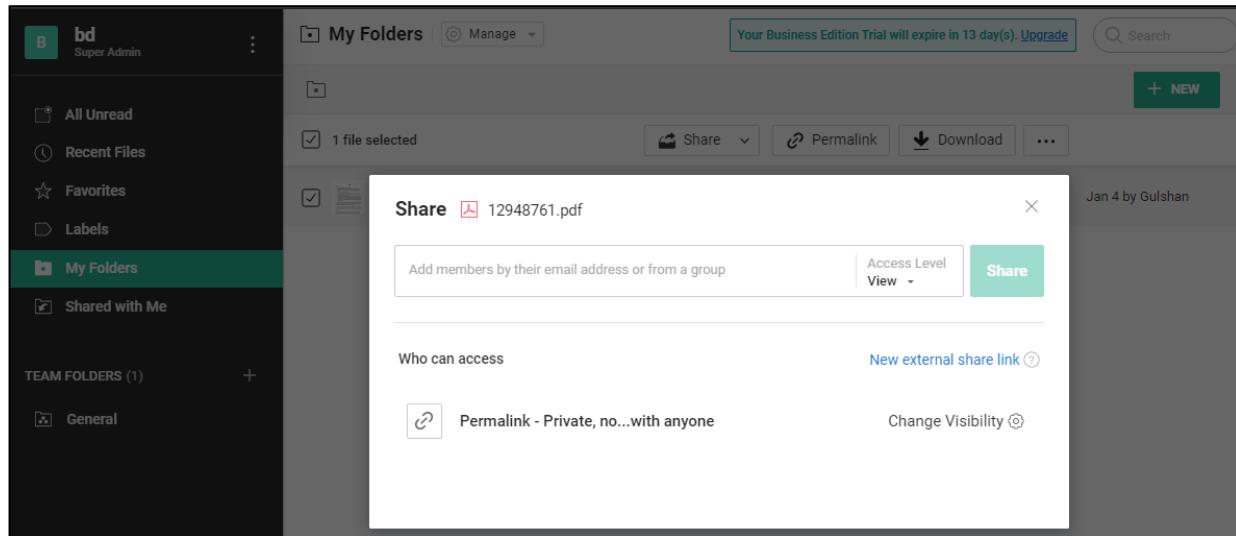
Source: <https://www.zoho.com/docs/faq/file-sharing-faq.html>

Share files instantly.

Don't limit yourself to any file size. With Zoho WorkDrive, sharing large files is a breeze. Simply add your work to the Team Folders and it will be readily available to every member on the team. You can also work with members outside your team by sharing files externally.

The screenshot shows the Zoho WorkDrive interface. On the left, there's a sidebar titled "TEAM FOLDERS (1)" with a list of folders: Finance, General, HR, Marketing (which is selected and highlighted in green), Operations, QA #, and Testing teamFolder. To the right, a list of files is displayed with columns for Name, Updated by, and Created on. The files include: Banner ads, Billboard content, Product launch blurb, Zyber Product Catalog, North Street billboard.jpg, Conference details, and Keywords list. At the bottom left, there's a modal window titled "Create Team Folder" with fields for "Name" (containing "Enter a Team Folder name") and "Choose Your Team Folder Type" (with options "Public" and "Private"). At the bottom right, there's a callout box with the text "Work with your team online." and "We're Online!"

Source: <https://www.zoho.com/workdrive/filesharing.html>



Source: Zoho website as seen by a typical user at workdrive.zoho.com/home/0hs0pecf7ce23a4244cdc8436c8bf160cff62/privateSpace/folders/files

47. With the Accused Product, Defendant performs a method for sharing data via a server comprising forwarding the request by the server to the second client machine. For example, Zoho Docs and Zoho WorkDrive generates a share link which is sent to the second user (“second client machine”) to provide access to the shared files from the first user (“first client machine”).

Share and Collaborate

Set permissions, share files, and brainstorm with your colleagues to enhance productivity.

[Learn more](#)



Password protected links

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Group sharing

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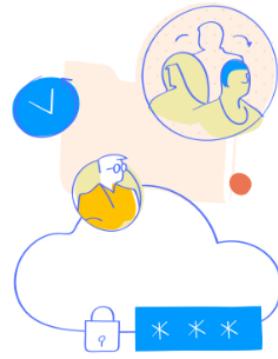
In-app chat

Group collaboration used to mean endless back-and-forth messages and lots of wasted time. Now discuss ideas and decide changes in real time with the chat feature within the document.



Tasks and reminders

Manage and delegate work among team members. Set reminders and notifications to get work done on time.



Source: <https://www.zoho.com/docs/features.html>

Zoho Docs allows you to share files with individuals or a group and collaborate in real-time. You can either share individual files or organize all your files into folders and share it with your team or with external partners, clients and customers. Shared folders are ideal for people who work on the same files together. When you create a new shared folder and add people to it, the files in the shared folder will appear in their Zoho Docs just as they do in yours. Any user who is part of the shared folder can add, delete or edit the content within that folder, based on the access privileges.

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Share Settings X

Visibility: Public ▾

Collaborators:

<input type="text" value="aaron.jones <aaron.jones@zillum.com>,"/> <input checked="" type="checkbox"/> Notify through Email - Add Message	Read/Write ▾ <input type="checkbox"/> Read Only <input checked="" type="checkbox"/> Read/Write <input type="checkbox"/> Co-Owner
<input type="text" value="raymond.p@zylker.com"/>	Read/Write ▾

Source: <https://www.zoho.com/docs/help/secure-sharing.html>

Zoho Docs users can share multiple documents at once with an unlimited number of people. You can share either privately, which requires entering email addresses manually, or with a preformed group. You can also assign either read-only or read-and-edit permissions to the recipients.

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1. Select the document you want to share.
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3. A dialog box with heading *Share settings* appears on the screen.
4. Enter the email address of the recipient.
5. Specify the access permission (Viewer/Collaborator/Co-Owner) for the shared document.
6. Click Share

To Share Documents to Groups

1. Select the document you want to share.
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6. Click Share

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The screenshot shows a sidebar with 'TEAM FOLDERS (13)' containing 'Marketing' (selected), 'Finance', 'General', 'HR', 'Operations', 'QA', and 'Testing teamFolder'. To the right is a list of files and folders with their details:

File/Folder	Created By	Last Modified
Banner ads	Ryan West	Nov 1
Billboard content	Ryan West	Nov 1
Product launch blog	Ryan West	Nov 1
Zyker Product Catalog	Ryan West	Oct 3
North Street billboard.jpg	Mustafa	Oct 3
Conference details	Ryan West	Oct 3
Keywords list	Scott Farmer	Oct 3

Create Team Folder

Name:

Enter a Team Folder name

Choose Your Team Folder Type
 Public Private

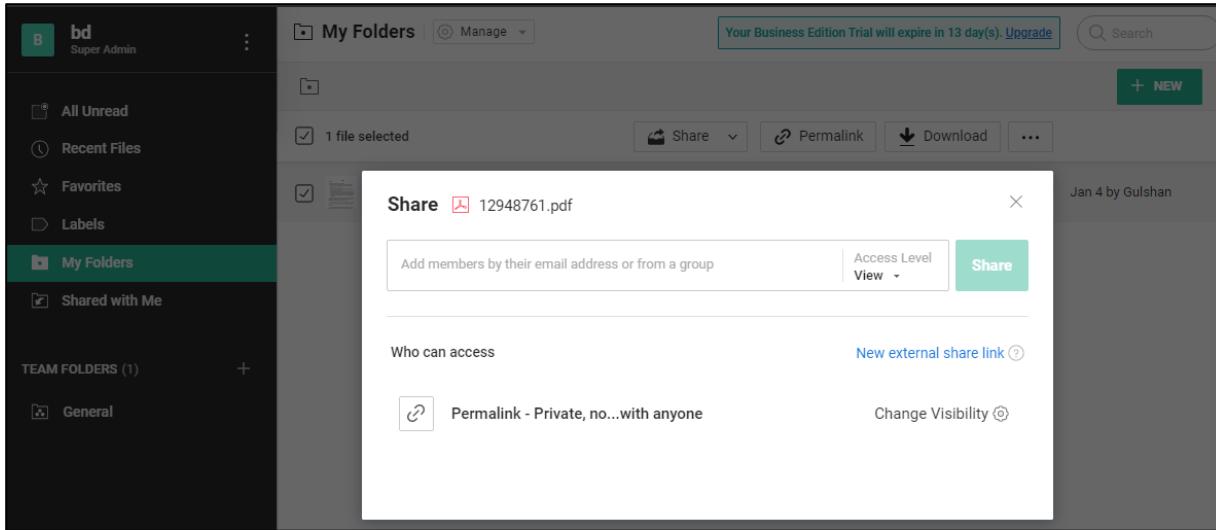
Anyone in the team can join and collaborate on files and folders

Work with your team online.

WorkDrive allows you to create a secure and collaborative workspace where everything is available to everyone on the team. All you need to work together in realtime is a link.

We're Online!

Source: <https://www.zoho.com/workdrive/filesharing.html>



Source: Zoho website as seen by a typical user at workdrive.zoho.com/home/0hspecf7ce23a4244cdc8436c8bf160cff62/privateSpace/folders/files

48. With the Accused Product, Defendant performs a method for sharing data via a server comprising permitting the first client machine to communicate with the second client machine via the server in response to the second client machine granting the request. For example, when the second user (“second client machine”) accesses the share link forwarded from the first user (“first client machine”) through Zoho Docs and Zoho WorkDrive (“server”). Zoho Docs and Zoho WorkDrive provide chats and comments functionality which allows the first user to have conversations around the shared files with the second user.

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Tasks and reminders

Manage and delegate work among team members. Set reminders and notifications to get work done on time.





Source: <https://www.zoho.com/docs/features.html>



Debate and discuss

Interact with your collaborators while you work using the in-app chat feature. Alternatively, you can chat with anyone in your organization with the integrated Zoho Chat option.



Be in control

Eliminate overwriting while collaborating with your colleagues. Take sole charge of your work with the Check-In/Check-Out feature, which allows only one person to work on a document at a time.



Revisit your work

Does yesterday's write-up seem better than today's copy? Zoho Docs lets you recover all previous versions of a document. Avoid the mess of creating multiple copies of the same file. Compare versions, and assess which parts work the best.



Mark as final

Make your meetings meaningful. Finalize your document to know exactly which file to present and discuss. Keep all your collaborators on the same page with file status updates.

Source: <https://www.zoho.com/docs/online-collaboration.html>

The screenshot shows the Zoho Docs interface. On the left, there's a sidebar with 'CREATE' and 'UPLOAD' buttons, followed by sections for 'All Files', 'Favorites', and 'Folders'. The 'Folders' section lists several categories: 'Guide -Best practises', 'Backstage documents', 'Left pane structure for ba...', '1_draft', '4_EDIT', '2_TEAM', '3_PROD TEAM', 'UG for backstage', '1_DRAFT', 'USE CASES and docs', 'Next draft of UG', '2_team', '3_prod team', '4_edit', 'sent to editors', '*Junk', and 'other changed pages in...'. On the right, there's a file browser window titled 'Folders > 4_edit' showing a file named 'An Introduction to Video Scripts'. Below this is a chat window with two participants: 'Sera Mariyam' and 'You'. The conversation starts with 'Hey. How can I help you?' from 'You', followed by 'How do I sent this file for review?' from 'Sera Mariyam', and ends with 'Create a task and set the task type as "review"' from 'You'.

Source: <https://www.zoho.com/docs/help/online-collaboration.html>

The screenshot shows a PDF document titled '12948761.pdf'. The document contains the word 'CLAIMS' and the text 'We claim: 1. A method for sharing data, the method comprising: receiving in a server in a system a request from a first user using a first client machine to establish a connection with a second user using a second client machine;'. To the right of the document, there is a 'Comments (2)' section with two entries: 'Gulshan' (@Sumit Negi WHATS UP) and 'Sumit Negi' (@Gulshan good work). The entire 'Comments (2)' section is highlighted with a red box.

Source:
<https://workdrive.zoho.in/home/0hs0specf7ce23a4244cdc8436c8bf160cff62/privateSpace/folders/files>

49. With the Accused Product, Defendant performs a method for sharing data via a server comprising in response to the first client machine uploading a file to a file list coupled to a store that is remotely located to the first and second client machines notifying the second client machine by the server of the file. For example, the shared data among the first user (“first client machine”) and the second user (“second client machine”) of Zoho Docs and Zoho WorkDrive is stored in the remotely located centralized cloud storage (“store”) comprising various folders and subfolders (“file list”). For example, when the first user uploads a file or adds a comment to the shared file, Zoho Docs and Zoho WorkDrive (“server”) comprises smart notifications functionality using which it provides notifications to the second user when shared files or folders are changed by first user.

Store everything online.

From documents to images, spreadsheets to presentations, and even your music, movies, and pictures, carry all your files with you wherever you go. With everything stored in a centralized location, now you can conveniently share your files with your friends and colleagues.



Virtual Drive

It doesn't take much to move your work online —in fact, it's free! Start with 5 GB of free storage. Stop carrying a flash drive around and store your data in the cloud.

[Learn more](#)



Sync

Sync from your Windows, Mac, or Ubuntu Linux computers to the cloud and vice-versa without any trouble. Find your latest files on any computer, both on and offline.

[Learn more](#)



Organize

Find the information right when you need it. Categorize files by project, file type, and author. Organize them under folders and sub-folders.

[Learn more](#)

Source: <https://www.zoho.com/docs/>

Cloud Storage

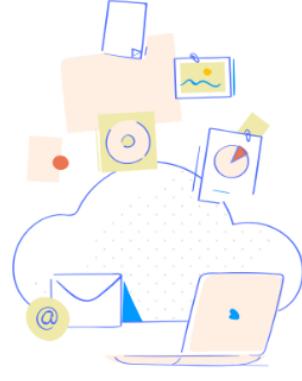
Store all your files, images, and music in a central location and share them effortlessly with friends and colleagues. [Learn more](#)

 **Bulk uploads**
Upload files individually, or select and save multiple files at once.

 **Store large files**
Save videos, product screenshots, and even entire databases without worrying about file size.

 **Email in**
Send documents from your email or scanner directly to your cloud account without signing in.

 **Organize**
Create folders and subfolders to categorize your files by projects, file types, function, etc., and find anything instantly.



Source: <https://www.zoho.com/docs/features.html>

Help Home > Docs - FAQ > [General](#)

What is Zoho Docs?

Zoho Docs is an Online Document Management system where you can store all your files securely in a centralized location and can access them from anywhere and from any device. You can upload, store, create, edit, share, and view any type of file like documents, spreadsheets, presentations, pictures, music, videos, etc. Our advanced collaboration tools such as Shared Folders, Tasks and Groups will provide a collaborative environment for you and your team. You can also collaborate on documents in real-time, which is useful when you work as a team. To know more about our features, please check out our [Overview page](#).

+ What can I do with Zoho Docs?

Source: <https://www.zoho.com/docs/faq/zoho-docs-faq.html>

Get your team together

Bring all of your team members and files under one roof. Get a holistic view of what's happening in all the teams and discussions you've joined.

The screenshot shows the Zoho WorkDrive interface. On the left is a dark sidebar with a user profile icon (MD), the team name 'MagicPro Dron...', and a list of sections: 'All Unread', 'Recent Files', 'Favorites', 'My Folder', and 'Shared with Me'. Below this is a 'TEAM FOLDERS' section with six items: 'Design' (selected, highlighted in green), 'General', 'Marketing', 'Public Relations', 'Quality Assurance', and 'Video Team'. The main area is titled 'Design' and shows a list of files. At the top of the list is a folder named 'Drone delivery- christmas concept' uploaded by Cooper on Apr 4. Following it are several documents and images: 'Design team work items' (DRAFT, uploaded by Cooper 7 minutes ago), 'Drone christmas 2.jpg', 'Drone christmas concept.jpg', 'Brochure Content' (uploaded by Cooper on Apr 4), 'Brochure.pdf' (uploaded by Manny on Apr 4), 'Drone delivery concept 2.jpg' (uploaded by Manny on Apr 4), and 'Facebook ad design.jpg' (uploaded by Manny on Apr 4). A search bar and various filter and sort options are at the top of the main list.

Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

The screenshot shows the 'Advanced analytics' section of the Zoho Docs features page. It includes a sub-section titled 'Audit Trail' with the description: 'Get notified of all the edits made to a file and the identity of the individual making them.' and a 'User stats and reports' section with the description: 'Keep track of the different versions of each file. Get a quick summary of all the times it's been accessed or modified.' To the right is a stylized illustration of a person wearing a yellow vest and hard hat, looking at a document with a pie chart, with arrows pointing towards it from a graph and a red circle.

Source: <https://www.zoho.com/docs/features.html>

Audit trail

When collaborating on a document, it's important to keep track of who made which changes. Hold collaborators accountable for these changes.

Get notified

Don't get lost in a maze of edits. Get instant notifications via email any time changes are made and stay up-to-date on modifications made to your file.

Access reports and stats

Identify who has accessed and worked on your documents. Get details about the date, time, editor name, and number of times your file has been opened.

Source: <https://www.zoho.com/docs/online-collaboration.html>

Stay updated.

Receive instant notifications on any edits your team makes to the files. Track changes and save multiple versions, so you can always revert to an earlier version that you feel is the best.

Pause collaboration.

Use the Check out feature when you want to modify a document without any intervention. And once you have your idea in place, Check in to make it visible to everyone.

Source: <https://www.zoho.com/workdrive/filesharing.html>

Be more aware.

Manage user and file activities, and keep track of them at all times.

Type	Name or Location	Access Date
Emy Jackson	Sep 02, 2016 - 11:07 AM	
Ambrose	Aug 30, 2016 - 02:09 PM	
Kate W	Aug 29, 2016 - 06:50 PM	
Mark E	Aug 25, 2016 - 11:01 AM	
Jane R	Aug 24, 2016 - 04:55 PM	
Steve W	Aug 19, 2016 - 11:19 AM	

Source: <https://www.zoho.com/docs/online-collaboration.html>

50. Wherein, in response to the first client machine uploading a file to a file list coupled to a store that is remotely located to the first and second client machines establishing a level of access to the file list coupled to the store, wherein the store is independent of a file path and unnavigable to by a user. For example, the shared data among the first user (“first client machine”) and the second user (“second client machine”) of Zoho Docs and Zoho WorkDrive is stored in the geographically located cloud storage (“store”). The folders and subfolders (“file list”) displayed to the users on their interfaces are corresponding to the data stored at the storage (“file list coupled to the store”). For example, the first user shares a link to the shared folder for the second user to access the data stored in the shared folder. This link does not define location or name of the cloud storage and therefore the store is independent of the file path and unnavigable by any user. For example, Zoho Docs and Zoho WorkDrive provides features to the first user to set access level on the shared data including but not limited to “view only”, “view and comment”, “share” and “edit”. When the first user shares a file or folder with the second user, the shared folder is accessible to the second user based on the access level set by the first user.

Store everything online.

From documents to images, spreadsheets to presentations, and even your music, movies, and pictures, carry all your files with you wherever you go. With everything stored in a centralized location, now you can conveniently share your files with your friends and colleagues.

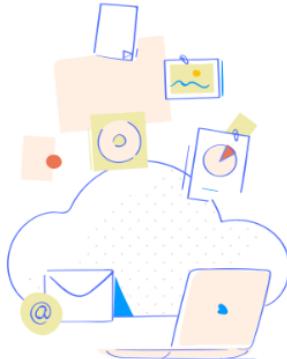
 Virtual Drive <p>It doesn't take much to move your work online —in fact, it's free! Start with 5 GB of free storage. Stop carrying a flash drive around and store your data in the cloud.</p> <p>Learn more</p>	 Sync <p>Sync from your Windows, Mac, or Ubuntu Linux computers to the cloud and vice-versa without any trouble. Find your latest files on any computer, both on and offline.</p> <p>Learn more</p>	 Organize <p>Find the information right when you need it. Categorize files by project, file type, and author. Organize them under folders and sub-folders.</p> <p>Learn more</p>
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Source: <https://www.zoho.com/docs/>

Cloud Storage

Store all your files, images, and music in a central location and share them effortlessly with friends and colleagues. [Learn more](#)

 Bulk uploads <p>Upload files individually, or select and save multiple files at once.</p>	 Store large files <p>Save videos, product screenshots, and even entire databases without worrying about file size.</p>
 Email in <p>Send documents from your email or scanner directly to your cloud account without signing in.</p>	 Organize <p>Create folders and subfolders to categorize your files by projects, file types, function, etc., and find anything instantly.</p>



Source: <https://www.zoho.com/docs/features.html>

Help Home > Docs - FAQ > General

What is Zoho Docs?

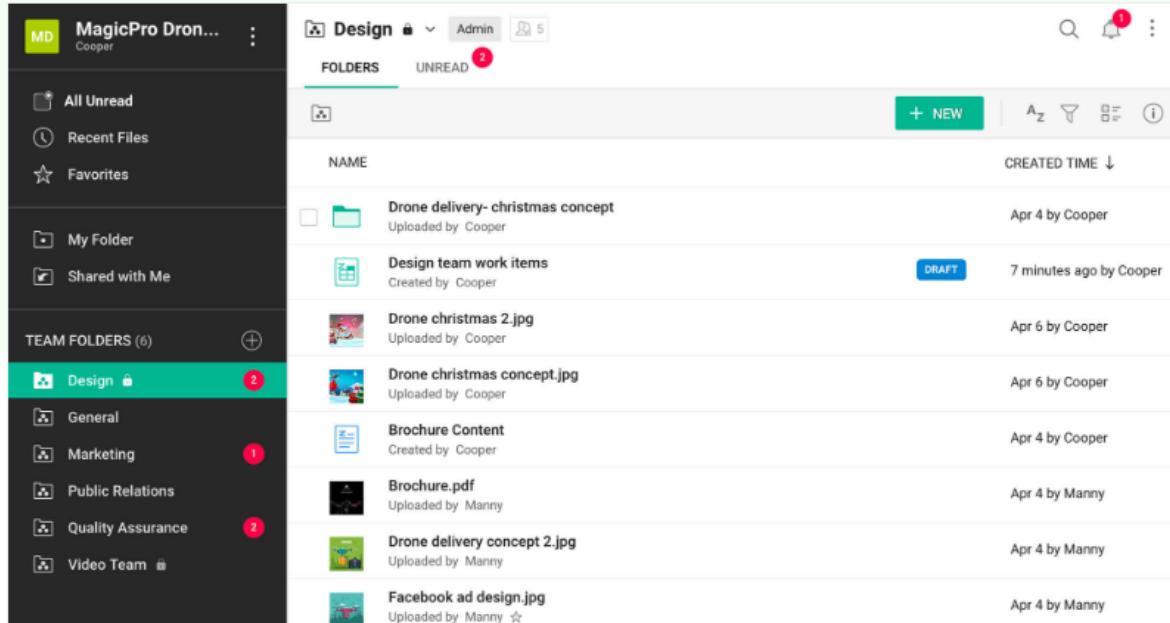
Zoho Docs is an Online Document Management system where you can store all your files securely in a centralized location and can access them from anywhere and from any device. You can upload, store, create, edit, share, and view any type of file like documents, spreadsheets, presentations, pictures, music, videos, etc. Our advanced collaboration tools such as Shared Folders, Tasks and Groups will provide a collaborative environment for you and your team. You can also collaborate on documents in real-time, which is useful when you work as a team. To know more about our features, please check out our [Overview page](#).

+ What can I do with Zoho Docs?

Source: <https://www.zoho.com/docs/faq/zoho-docs-faq.html>

Get your team together

Bring all of your team members and files under one roof. Get a holistic view of what's happening in all the teams and discussions you've joined.



The screenshot shows the Zoho Workdrive interface. On the left, there is a sidebar with a user profile (MagicPro Dron... Cooper), navigation links (All Unread, Recent Files, Favorites), and a list of Team Folders (Design, General, Marketing, Public Relations, Quality Assurance, Video Team). The main area displays a list of files and folders in the 'Design' folder. The list includes:

NAME	CREATED TIME
Drone delivery- christmas concept	Apr 4 by Cooper
Design team work items	DRAFT 7 minutes ago by Cooper
Drone christmas 2.jpg	Apr 6 by Cooper
Drone christmas concept.jpg	Apr 6 by Cooper
Brochure Content	Apr 4 by Cooper
Brochure.pdf	Apr 4 by Manny
Drone delivery concept 2.jpg	Apr 4 by Manny
Facebook ad design.jpg	Apr 4 by Manny

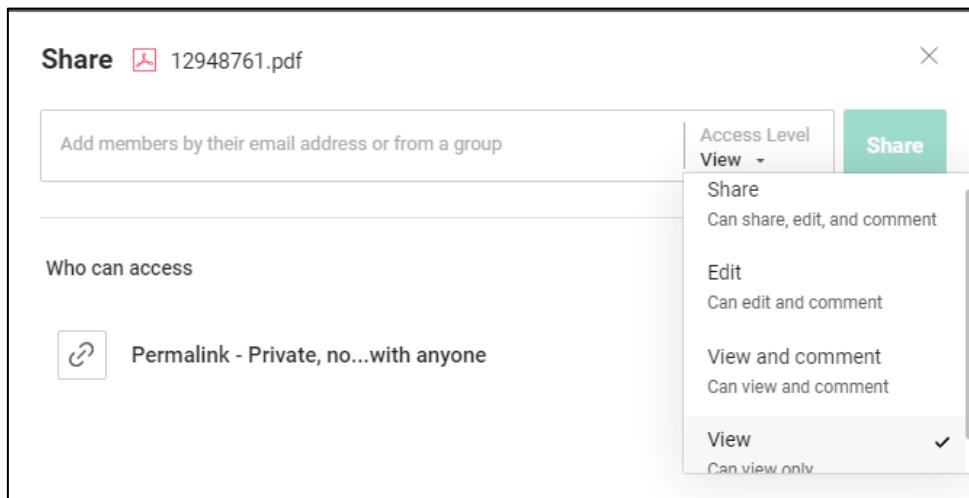
Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

Customize link permissions.

Guage how your content performed.

Create a password-protected link, enable or disable downloads, and set an expiry date when you want to provide temporary access to your files. You can also create a customized URL to make it look more professional.

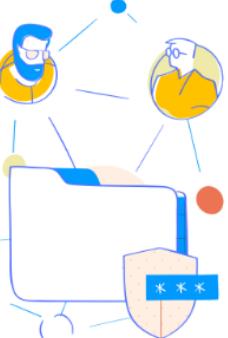
Source: <https://www.zoho.com/workdrive/filesharing.html>



Source:
<https://workdrive.zoho.in/home/0hs0pecf7ce23a4244cdc8436c8bf160cff62/privespace/folders/files>

Set up and Admin controls

Customize your system to suit organizational policies, and stay in control of user information and permissions. [Learn more](#)



Manage user access
Add members and assign privileges as per organization policies. Or, provide role-based permissions.

eDiscovery
As an admin, search, find, and view any file created by any user within your organization.

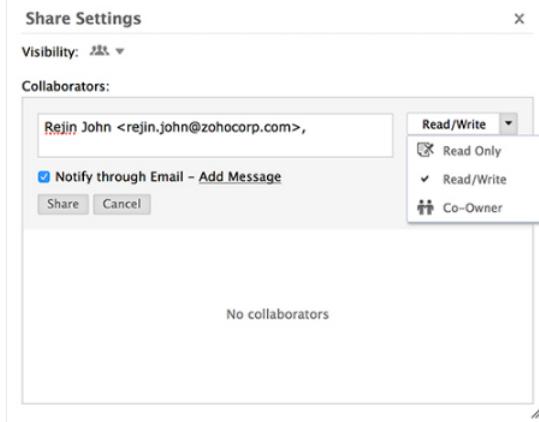
Unlimited file recovery
Retrieve and restore every single file in your organization, even deleted ones.

Custom branding
Personalize Zoho Docs by adding your company logo, and customize settings to suit your needs.

Source: <https://www.zoho.com/docs/features.html>

Decide who does what.

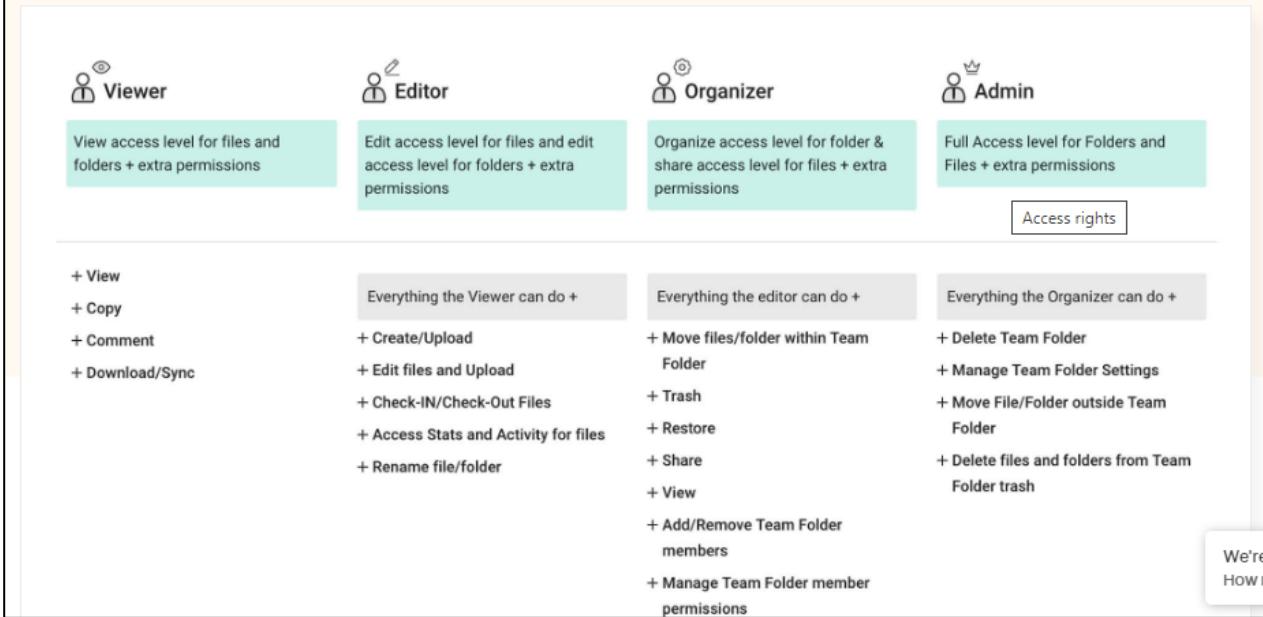
Grant access based on each team member's function.

<p> Co-owner</p> <p>Share equal responsibility. Enable co-ownership for a document.</p>	<p> Read/Writer</p> <p>Let people collaborate with you. Permit them to view and edit your files.</p>
	
<p> Read only</p> <p>Keep your partners and stakeholders in the loop by allowing them to view your documents.</p>	<p> Read/Comment</p> <p>Invite suggestions from your co-workers. Allow them to review and comment.</p>

Source: <https://www.zoho.com/docs/online-collaboration.html>

Roles with responsibilities

Every team member has a role to play. Bring in each person with the right access permissions for their role in the Team Folder.



Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

51. With the Accused Product, Defendant performs a method for sharing data via a server comprising establishing a connection between the file list and the store by a secured channel to download the file. For example, when the second user accesses the shared link sent from the first user in order to access the shared file stored in cloud storage (“store”), Zoho Docs and Zoho WorkDrive establishes a secure connection to download the file. Zoho Docs and Zoho WorkDrive securely download data which is available to second user according to the access permission provided by the first user.

Share and Collaborate

Set permissions, share files, and brainstorm with your colleagues to enhance productivity.

[Learn more](#)


Password protected links

Control access to confidential information by setting up a password for your documents.


Group sharing

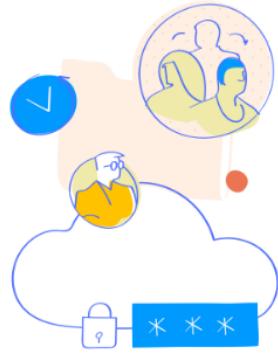
Forget sharing files with your team members one at a time. Create a group alias and share ideas as often as you like.


In-app chat

Group collaboration used to mean endless back-and-forth messages and lots of wasted time. Now discuss ideas and decide changes in real time with the chat feature within the document.


Tasks and reminders

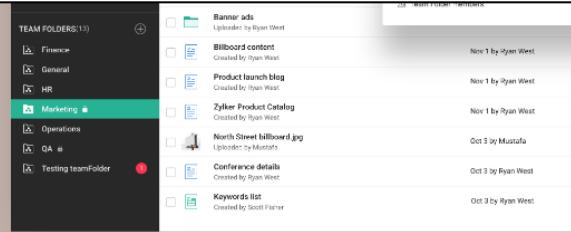
Manage and delegate work among team members. Set reminders and notifications to get work done on time.

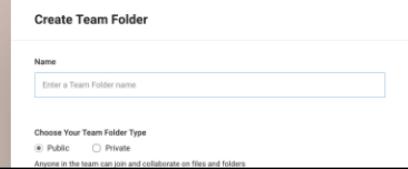


Source: <https://www.zoho.com/docs/features.html>

Share files instantly.

Don't limit yourself to any file size. With Zoho WorkDrive, sharing large files is a breeze. Simply add your work to the Team Folders and it will be readily available to every member on the team. You can also work with members outside your team by sharing files externally.



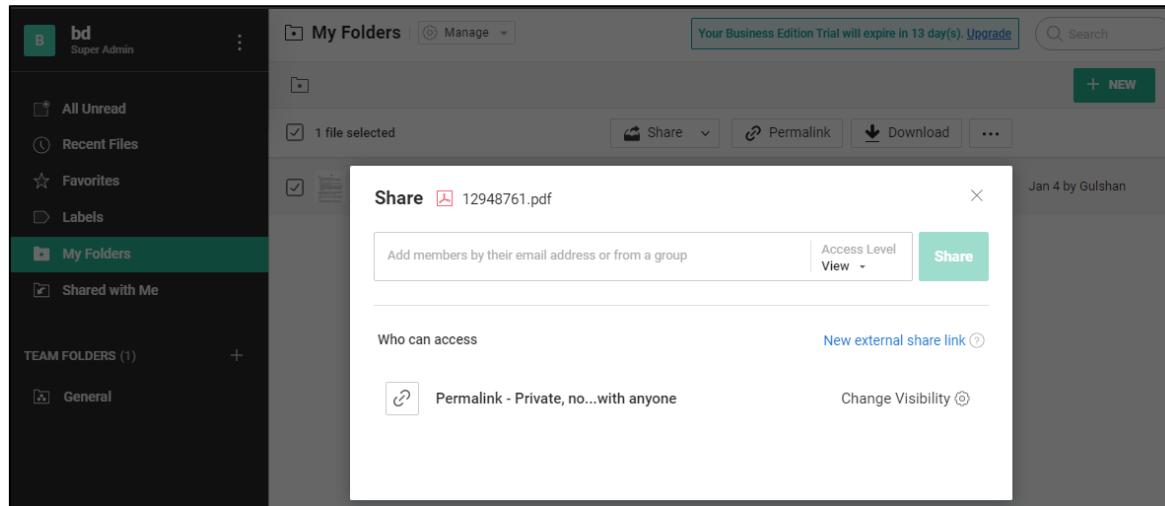


Work with your team online.

WorkDrive allows you to create a secure and collaborative workspace where everything is available to everyone on the team. All you need to work together in realtime is a link.

We're Online!

Source: <https://www.zoho.com/workdrive/filesharing.html>



Source: Zoho website as seen by a typical user at
workdrive.zoho.com/home/0hs0pecf7ce23a4244cdc8436c8bf160cff62/privateSpace/folders/files

Data security.

Encryption in transit and at rest

Files in Zoho Docs are encrypted at rest with 256-bit Advanced Encryption Standard (AES). During transit, Perfect Forward Secrecy (PFS) generates a unique key for each session to encrypt files. Zoho Docs's servers and clients are connected through SSL and secured with an RSA-based 2048-bit encryption key.

File backup

With multiple file backup locations, your information is always safe. Multiple copies of your files are stored in different locations, thereby protecting your data from any disaster or hardware failure.

Virus, malware, and spam detection

Any files within Zoho Docs go through virus, malware, and spam checks to detect any infections. Such files are prevented from being distributed to others.

Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

	Disaster recovery		Intrusion protection
<p>Our servers are well protected from all kinds of physical damage. Zoho servers run on distributed grid architecture. In case of server damage, a copy of your files will be safely backed up in an alternate server and available without any noticeable delay.</p>	<p>All files are first checked for viruses before being uploaded and stored in Zoho servers. Our screening uses powerful Intrusion Detection and Intrusion Prevention systems (IDS/IPS) and our systems are secured from DDoS attacks.</p>		
	Two-factor authentication		Encryption in transit and at rest
<p>Protect your Zoho WorkDrive account with Two-Factor Authentication (TFA). Security means more than just a password. To ensure strong protection, you'll also get a unique code generated every time you log into an account.</p>	<p>With Zoho WorkDrive, your data is always safe. Files in Zoho WorkDrive are encrypted at rest with 256-bit Advance Encryption Standard (AES). During transit, Perfect Forward Secrecy (PFS) generates a unique key for each session to encrypt files.</p>		

Source: <https://www.zoho.com/workdrive/security.html>

	Admin-level controls		Transfer file ownership
<p>Choose where your files can be shared. As an admin, you can decide whether to allow your users to share files only internally, or outside your team as well. Avoid the clutter by only allowing team admins to create public groups.</p>	<p>What's created in an organization should stay in the organization. Don't let ex-employees leave with the important files they created and worked on. Transfer ownership of files from one user to another to keep them in the right hands.</p>		
	Share links that expire		Role-based permissions
<p>Make your data available only for as long as you want to. Set expiration dates for your quarter-end reports, research findings, or other vital documents while sharing them externally. After the expiration date, your external partners won't be able to view your data.</p>	<p>Give users only as much access as they need. Use roles like viewer or commenter when you want to involve your stakeholders but don't want them to make changes to your files. Set roles like collaborator or moderator when you'd like people to contribute to your work.</p>		

Source: <https://www.zoho.com/workdrive/security.html>

The screenshot shows a file management interface with the following structure:

- Explorer All Files**: The title bar.
- Actions**: A toolbar with Share, Add Task, Move, Copy, Delete, and Actions dropdown.
- NAME**: A column header for the document list.
- AUTHOR**: A column header for the document author.
- TODAY**: A section header.
- Customer Invoice**: A document listed under Today, marked as locked by me. It has a red box around its download icon.
- PREVIOUS 7 DAYS**: A section header.
- Invoice**, **Contacts**, **Product Presentation**: Documents listed under Previous 7 Days, all marked as me.
- PREVIOUS 30 DAYS**: A section header.
- Welcome**: A document listed under Previous 30 Days, marked as me.
- EARLIER**: A section header.
- Download**: A large black button at the bottom right of the interface.

Source: <https://www.zoho.com/docs/help/download-document.html>

52. Claim 2 of the '120 Patent recites:

The method of claim 1, wherein a first user is a member of a group, and the request is to invite a second user to join the group, and the group is closed to other users that have not been invited by a member of the group, no mutual communication is allowed between a member of the group and any of the other users.

53. With the Accused Product, Defendant performs a method for sharing data via a server wherein a first user is a member of a group, and the request is to invite a second user to join the group, and the group is closed to other users that have not been invited by a member of the group, no mutual communication is allowed between a member of the group and any of the other users. For example, when a first user shares a folder (“group”) already accessible to users with proper access permissions with a second user, the second user accesses the shared folder using the shared link and becomes one of the

users with required access permissions to access the shared folder. Users with no required access permissions cannot access the folder and thus cannot further share the files (“mutual communication”) with users with proper access permissions.

Work together

There's a new way to collaborate. Share instantly instead of sending threaded emails and copies of documents. Make your documents available immediately to your team by adding them to a Team Folder.



Get your team together

Bring all of your team members and files under one roof. Get a holistic view of what's happening in all the teams and discussions you've joined.

Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

The screenshot shows the Zoho WorkDrive interface. On the left, there's a sidebar with navigation links like 'All Unread', 'Recent Files', 'Favorites', 'My Folder', and 'Shared with Me'. Below this is a section titled 'TEAM FOLDERS (6)' containing six folders: 'Design', 'General', 'Marketing', 'Public Relations', 'Quality Assurance', and 'Video Team'. A red box highlights this section. The main area lists various files and folders with details like name, created time, and uploaded by user. For example, 'Drone delivery- christmas concept' was uploaded by Cooper on Apr 4.

Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

Roles with responsibilities

Every team member has a role to play. Bring in each person with the right access permissions for their role in the Team Folder.

Viewer	Editor	Organizer	Admin
View access level for files and folders + extra permissions	Edit access level for files and edit access level for folders + extra permissions	Organize access level for folder & share access level for files + extra permissions	Full Access level for Folders and Files + extra permissions
<ul style="list-style-type: none"> + View + Copy + Comment + Download/Sync 	<ul style="list-style-type: none"> Everything the Viewer can do + + Create/Upload + Edit files and Upload + Check-IN/Check-Out Files + Access Stats and Activity for files + Rename file/folder 	<ul style="list-style-type: none"> Everything the editor can do + + Move files/folder within Team Folder + Trash + Restore + Share + View + Add/Remove Team Folder members + Manage Team Folder member 	<ul style="list-style-type: none"> Everything the Organizer can do + + Delete Team Folder + Manage Team Folder Settings + Move File/Folder outside Team Folder + Delete files and folders from Team Folder trash

We're How r

Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

The screenshot shows four features of the Zoho WorkDrive admin dashboard:

- Set up in minutes**: Quickly bring in team members with an invitation link, either by importing their email addresses or by linking your Active Directories with SAML authentication.
- Create functional groups**: Create groups based on team members' functions. Quickly create Team Folders for a particular project by adding the functional groups you want to include.
- Roles and permissions**: Assign each person a role as a team admin or a team member. As an admin, keep an eye on the team's file activities using the admin panel. This feature is highlighted with a red border.
- Customize your team profile**: Make Zoho WorkDrive work the way you do. Decide who gets to create Team Folders, share content externally, or download files to their devices.

Source: <https://www.zoho.com/workdrive/admin-dashboard.html>

54. Claim 3 of the '120 Patent recites:

The method of claim 2, wherein the file is distributed to all members in the group without sending a copy of the file to each of the all members in the group at the same time.

55. With the Accused Product, Defendant performs a method for sharing data via a server wherein the file is distributed to all members in the group without sending a copy of the file to each of the all members in the group at the same time. For example, the shared file is present in the cloud storage and is accessible to all the users with proper access permissions rather than sending a copy of the file to each user with proper access permissions.

Work together

There's a new way to collaborate. Share instantly instead of sending threaded emails and copies of documents. Make your documents available immediately to your team by adding them to a Team Folder.



Get your team together

Bring all of your team members and files under one roof. Get a holistic view of what's happening in all the teams and discussions you've joined.

Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

Roles with responsibilities

Every team member has a role to play. Bring in each person with the right access permissions for their role in the Team Folder.

Viewer	Editor	Organizer	Admin
View access level for files and folders + extra permissions	Edit access level for files and edit access level for folders + extra permissions	Organize access level for folder & share access level for files + extra permissions	Full Access level for Folders and Files + extra permissions
+ View + Copy + Comment + Download/Sync	Everything the Viewer can do + + Create/Upload + Edit files and Upload + Check-IN/Check-Out Files + Access Stats and Activity for files + Rename file/folder	Everything the editor can do + + Move files/folder within Team Folder + Trash + Restore + Share + View	Everything the Organizer can do + + Delete Team Folder + Manage Team Folder Settings + Move File/Folder outside Team Folder + Delete files and folders from Team Folder trash + Add/Remove Team Folder members + Manage Team Folder member

Source: <https://www.zoho.com/workdrive/collaborate-using-team-folder.html>

The screenshot shows four feature cards in a grid:

- Set up in minutes**: Quickly bring in team members with an invitation link, either by importing their email addresses or by linking your Active Directories with SAML authentication.
- Create functional groups**: Create groups based on team members' functions. Quickly create Team Folders for a particular project by adding the functional groups you want to include.
- Roles and permissions**: Assign each person a role as a team admin or a team member. As an admin, keep an eye on the team's file activities using the admin panel.
- Customize your team profile**: Make Zoho WorkDrive work the way you do. Decide who gets to create Team Folders, share content externally, or download files to their devices.

Source: <https://www.zoho.com/workdrive/admin-dashboard.html>

56. The foregoing infringement on the part of Defendant has caused past and ongoing injury to Plaintiff. The amount of damages adequate to compensate for the infringement shall be determined at trial but is in no event less than a reasonable royalty from the date of first infringement to the expiration of the '120 Patent.
57. To the extent Defendant continues, and has continued, its infringing activities noted above in an infringing manner post-notice of the '120 Patent, such infringement is necessarily willful and deliberate.

PRAYER FOR RELIEF

WHEREFORE, BCS respectfully requests the Court enter judgment against Defendant:

1. declaring that the Defendant has infringed the '120 Patent;
2. awarding BCS its damages suffered as a result of Defendant's infringement of the '120 Patent;
3. awarding BCS its costs, attorneys' fees, expenses, and interest; and
4. granting BCS such further relief as the Court finds appropriate.

JURY DEMAND

BCS demands trial by jury, Under Fed. R. Civ. P. 38.

Dated: January 19, 2021

Respectfully Submitted

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